

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

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SECURITIES AND EXCHANGE	:	
COMMISSION,	:	
	:	
Plaintiff,	:	
	:	
-against-	:	Civil Action No. 1:21-cv-00260-PB
	:	
LBRY, INC.,	:	
	:	
Defendant.	:	
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**ASSENTED-TO MOTION TO ENLARGE DEADLINE TO OBJECT TO AND
REPLY TO OBJECTION OF PLAINTIFF’S MOTION TO STRIKE OR
PRECLUDE USE OF AMENDED REPORT OF LBRY’S EXPERT**

NOW COMES the Defendant, LBRY, Inc. (“LBRY”), by and through counsel, Shaheen & Gordon, P.A. and Perkins Coie LLP, moving to enlarge the deadline to object to and reply to the objection of Plaintiff Securities and Exchange Commission’s (“SEC”) Motion to Strike or Preclude Use of Amended Report of LBRY’s Expert and, in support thereof, states as follows:

1. On June 8, 2022, the SEC filed a Motion to Strike, which asks the Court to strike or preclude LBRY’s use of the Amended Report of its expert, Dr. Boris Richard.
2. The current deadline for LBRY to object to the Motion to Strike is June 22, 2022, and the SEC’s deadline to file a reply, if any, is June 29, 2022.
3. LBRY requests an enlargement of time to file an Objection to the Motion to Strike to June 29, 2022.
4. LBRY recently filed a Reply to the SEC’s Objection to LBRY’s Motion for Summary Judgment on June 10, 2022, and LBRY’s deadline to object to the SEC’s Motion for Summary Judgment is June 17, 2022. Granting LBRY one additional week to respond to the

Motion to Strike will allow LBRY sufficient time to fully address the issues raised in the SEC's Motion to Strike.

5. Under LBRY's requested extension, the SEC's reply would be due July 6, 2022. In view of the July 4 holiday, if the Court grants LBRY's requested extension, the SEC requests an enlargement of time to file a reply, if any, to July 7, 2022.

6. LBRY certifies pursuant to Local Rule 7.2 that the relief requested will not result in the continuance of any hearing, conference, or trial in this matter.

7. The SEC assents to the relief sought herein.

8. Due to the nature of the relief sought, no memorandum of law is required.

WHEREFORE, LBRY respectfully requests that this Honorable Court:

- a. Grant the within Motion;
- b. Enlarge the deadline to file an Objection to the SEC's Motion to Strike or Preclude Use of Amended Report of LBRY's Expert to June 29, 2022;
- c. Enlarge the deadline to file a Reply, if any, to LBRY's Objection to July 7, 2022; and
- d. Grant such further relief as the Court deems necessary, just and fair.

Dated: June 16, 2022

Respectfully submitted,

LBRY, INC.

By its Attorneys,

/s/ Timothy J. McLaughlin

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**SECURITIES AND EXCHANGE
COMMISSION**

By its Attorneys,

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

DATED: June 16, 2022

/s/ Keith W. Miller

Keith W. Miller

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule 7.1(c), I certify that a good faith attempt has been made to obtain concurrence in the relief sought, and that counsel for the SEC assents to the relief sought herein.

DATED: June 16, 2022

/s/ Keith W. Miller
Keith W. Miller